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THOMPSON COBURN

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September 1, 2000

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Via E-mail & Regular Mail

Thomas J. Martin, Jr., Esq. Associate Regional Counsel U.S. EPA, Region V Office of Regional Counsel 77 West Jackson Blvd. (C-14J) Chicago, IL 60604-3590

Mr. Kevin Turner
Environmental Scientist, DSC
U.S. EPA
c/o Crab Orchard Nat'l Wildlife Refuge
8588 Route 148
Marion, IL 62959

Re: Sauget Sites Area 1 – May 31, 2000 Unilateral Administrative Order – Soil/Sediment Removal Action September 1, 2000 Update re Status of Access Agreements

Dear Tom and Kevin:

Pursuant to the May 31, 2000 Unilateral Administrative Order ("UAO") between Solutia Inc. ("Solutia") and U.S. EPA, Solutia continues to work towards obtaining all the access agreements required for the soil and sediment removal work under the UAO. To date, Solutia has obtained access from thirteen (13) landowners. Only two (2) landowners have been somewhat recalcitrant in granting access: (1) Ruan Transport Corp.; and (2) Emily Hankins.

Solutia will continue to work towards obtaining access agreements from these two landowners. Ruan may be more willing to cooperate now that we can provide them with the results of the Area 1 sampling activities. In addition, we will continue to work with James Hankins to secure access to Emily Hankins' property. Please note, however, that if we cannot obtain access through James Hankins, or if Emily Hankins protests Solutia's right of access, we may request EPA's assistance.

Thomas J. Martin, Jr., Esq. Mr. Kevin Turner September 1, 2000 Page 2

Enclosed is an updated Access Agreement status chart summarizing Solutia's efforts in obtaining the necessary access agreements. Solutia hereby requests that you extend our access agreement deadline to October 2, 2000. Despite this request for an extension of time, Solutia will work quickly to secure the remaining access agreements as removal activities are scheduled to begin in the next few weeks. Please forward your written approval of this extension at your earliest convenience.

Please call me if you have any questions regarding this update.

Very truly yours,

Thompson Coburn LLP

By Colleen E. Muhuda Colleen E. Michuda

CEM/gao

Enclosure

cc: Mr. D. Michael Light – Solutia Inc. (w/encl.) Linda W. Tape, Esq. (w/encl.)

ACCESS AGREEMENTS FOR SOIL/SEDIMENT REMOVAL ACTIVITIES PURSUANT TO 5/31/00 UNILATERAL ADMINISTRATIVE ORDER			
REFERENCE #	PROPERTY OWNER	PARCEL NUMBER & PROPERTY LOCATION	ACCESS AGREEMENT SPECIAL PROVISIONS
G1	Cerro Copper Products Company	01-26.0-401-014 01-26.0-401-015	 Access Agreement forwarded via e-mail 6/9/00. 6/15/00 e-mail from R. Ricci re scope of access. 6/16/00 e-mail to R. Ricci stating access is required for ingress/egress and berm construction. 6/30/00 telephone call from R. Ricci to L. Tape re Access Agreement. 7/26/00 letter (fax & regular mail) to R. Ricci transmitting revised access agreement, map, and diagrams of work. E-mail exchange with R. Ricci (8/8/00) re status of Access Agreement. Cerro will sign. Signed Access Agreement (dated 8/14/00) received.
G2 G3	Harold Wiese	01-26.0-401-003 01-26.0-401-004	 Letter requesting access forwarded 6/8/00. 6/16/00 telephone call from W. Wittenberg inquiring into whether access will be limited to fenced area of Site G. 6/19/00 telephone call w/ W. Wittenberg, C. Michuda, and M. Light re area of Site G to be accessed Revised draft agreement from Wiese received 6/22/00. Solutia revised draft faxed to W. Wittenberg 6/26/00; telephone call w/ W. Wittenberg re same. 6/27/00 telephone call from W. Wittenberg. He will have Mr. Wiese sign the Agreement today.

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REFERENCE#	PROPERTY OWNER		ACCESS ACREEMENTASPECIAL PROVISIONS
			• 7/7/00 telephone call to W. Wittenberg re status of Access Agreement.
			• 7/24/00 e-mail to W. Wittenberg re Access Agreement.
			Telephone call (7/31/00) with W. Wittenberg re revisions to Access Agreement.
			Signed Access Agreement (dated 8/10/00) received.
G4	Andrew Hankins (c/o James Hankins)	01-26.0-401-011	Letter requesting access forwarded 6/8/00.
			Signed Access Addendum (dated 6/18/00) received.
G5	Emily Hankins	01-26.0-401-006	Letter requesting access forwarded 6/8/00.
			• Follow-up letter to E. Hankins forwarded 7/24/00.
			Follow-up letter to James Hankins (dated 8/8/00) forwarded.
L1	Metro Equipment Construction, Inc.	01-35.0-200-034	Letter requesting access forwarded 6/8/00.
	(Tony Lechner)		Signed Access Addendum (dated 6/9/00) received.
L2 L5 L3	L. Keeley Paving & Construction Co. L. Keeley Land Trust	01-35.0-200-035 01-35.0-200-036 01-35.0-200-033	 Letter requesting access forwarded 6/8/00. 6/9/00 letter from R. Striler noting that access addenda had been forwarded to L. Keeley and requesting that Solutia call L. Keeley re access needs. 6/15/00 telephone call to R. Striler stating access is
			for ingress/egress only. • 6/16/00 telephone call from R. Striler stating that

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REFERENCE#	PROPERTY OWNER:	PARCEL NUMBER & 💝 😤	
		PROPERTY LOCATION F	 info is passed on to Keeley with instructions to sign. Signed Access Addenda (dated 6/16/00) received.
			Signed Access Addenda (dated 6/16/00) received.
L4 L6	Ruan Transport Corp.	01-35.0-200-013 01-35.0-200-031	 Letter requesting access forwarded 6/8/00. 6/13/00 telephone call with D. Hermeling re access needs; requested conference call with Solutia re description of work. 6/14/00 maps of parcels forwarded to D. Hermeling. 6/16/00 telephone conference with D. Hermeling, C. Michuda, M. Light, and B. Yare re access needs. D. Hermeling concerned about potential loading/unloading on Ruan property. He wants more detail in writing. He will talk with his client. 6/27/00 facsimile from D. Hermeling. Ruan has concerns, needs additional information, but "remains willing to cooperate with Solutia." 7/24/00 letter to D. Hermeling (fax & regular mail) transmitting description and diagrams of work to be done. Letter (dated 7/31/00) from D. Hermeling, stating that receipt of analytical data is prerequisite to granting access. Letter (dated 8/8/00) to D. Hermeling stating that analytical results will be provided. 9/1/00 telephone call to D. Hermeling re sampling results and access arrespont.
			results and access agreement.
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ACCESS AGREEMENTS FOR SOIL/SEDIMENT REMOVAL ACTIVITIES PURSUANT TO 5/31/00 UNILATERAL ADMINISTRATIVE ORDER			
REFERENCE	# PROPERTY OWNER	PARCEL NUMBER & PROPERTY LOCATION	ACCESS AGREEMENT SPECIAL PROVISIONS
CSB6	Albert Lauman	01-35.0-202-016	 Letter requesting access forwarded 6/8/00. Signed Access Addendum (dated 6/22/00) received.
CSC7	Amrut Patel	01-35.0-102-003	 Letter requesting access forwarded 6/8/00. 6/12/00 telephone call from A. Patel re access. 6/13/00 original Access Agreement faxed to A. Patel. Signed Access Addendum (dated 6/14/00) received.
CSE5 CSE6 CSE35	South Cahokia Jaycees	01-35.0-311-002 01-35.0-311-003 01-35.0-307-022	 Letter requesting access forwarded 6/8/00. Signed Access Addendum (dated 6/14/00) received.
CSE20 CSE38 CSE39	St. Louis University (Parks College)	01-35.0-305-036 01-35.0-305-027 01-35.0-305-035	 Letter requesting access forwarded 6/8/00. 6/22/00 telephone call from R. Waters. K. Brady has been out of town, so she hasn't seen the agreements. He will follow-up week of 6/26/00. 7/7/00 telephone call to R. Waters re status of Access Addendum. Signed Access Addendum (dated 6/30/00) received.
CSE22 CSE23	St. Clair County	06-30.0-206-001* 06-30.0-206-002* *incorrect parcel numbers Per St. Clair County, correct parcel numbers are: 06-03.0-206-001 06-03.0-206-002	 Letter requesting access forwarded 6/8/00. 6/12/00 telephone call re parcel numbers (incorrect). 6/13/00 map of parcels faxed to County. 6/14/00 telephone call – correct parcel numbers are: 06-03.0-206-001 06-03.0-206-002

ACCESS AGREEMENTS FOR SOIL/SEDIMENT REMOVAL ACTIVITIES PURSUANT TO 5/31/00 UNILATERAL ADMINISTRATIVE ORDER			
	PROPERTY OWNER	PARCEL NUMBER &	ACCESS AGREEMENT SPECIAL PROVISIONS
			Signed Access Agreement (dated 6/14/00) received.
CSE24 CSE25	State of Illinois	06-30.0-205-001 06-30.0-205-002	 Letter requesting access forwarded 6/8/00. Signed Access Agreement (dated 6/21/00) received.
CSF1 CSF2 CSF3 CSF4 CSF6 CSF7	Village of Cahokia	06-03.0-208-001 06-03.0-208-002 06-03.0-207-001 06-03.0-207-002 06-03.0-204-001 06-03.0-203-001	 Letter requesting access forwarded 6/8/00. 7/20/00 Mike Light hand delivered addenda to Mayor for signature. 7/24/00 telephone call from M. Light to Mayor to follow-up. Mayor will review request at Aug. 15 Village council meeting. Signed Access Addendum (dated 8/23/00) received.
M1 M2 M3 M4 M5 M8 M9 M10 M11	Thomas Owen	01-35.0-201-001 01-35.0-201-002 01-35.0-201-003 01-35.0-201-004 01-35.0-201-005 01-35.0-202-001 01-35.0-202-002 01-35.0-202-003 01-35.0-202-004 01-35.0-202-017	 Letter requesting access forwarded 6/20/00. Signed Access Addendum (dated 6/22/00) received.